From: Ritter, Christine
To: "Jonathan Pfohl"; Steve Gandy (sgandy@mesco.com)
Cc: Mussler, Ed
Subject: RE: Wayne Co Active CDLF_Closed MSWLF (96-01) Request for App 2 Modification DRAFT
Date: Friday, November 21, 2014 4:06:00 PM

November 21, 2014

Jonathan and Steve-

The NC SWS upholds its decision to require the sampling and analysis of the full suite of Appendix II will from groundwater monitoring wells MW-1R, MW-2, MW-4, MW-6, MW-8, and MW-11 every 3 (three) years. Mercury will be analyzed from groundwater monitoring well MW-8 annually due to the following reasons:

Due to the detections of 1,3-Dichlorobenzene, 3 & 4-methylphenol, cyanide, isobutanol detected in MW-2 as recently as 2012-2104 at levels very close to the Solid Waste Section limit;
Due to the detections of bis(2-ethylhexyl)phthalate, diethylphthalate, and cyanide detected in MW-4 as recently as 2012-2013);
Due to the detection of di-n-butylphthalate in MW-8 in 2013-2014;
Due to the widespread and persistent detection of mercury in MW-8 from 1995 through and including 2014;
Due to the detection of cyanide and tin in MW-11 as recently as 2013;
Due to the widespread detection of dieldrin, 4,4'-DDT, BHC-alpha, BHC-gamma, in groundwater monitoring wells MW-2, MW-4, MW-6, and MW-8, historically for at least the last 10 years refutes that these constituents are artifacts;
Because of the NC SWS's decision to request Appendix II monitoring in groundwater monitoring wells MW-2, MW-4, MW-6, MW-8, and MW-11 at a very flexible schedule of once every 3 years, the background monitoring well, MW-1R must also be sampled for Appendix II as a baseline reference.

The correlation between landfill gas and the consistent detections of mercury in MW-8 was not supported in your request by any scientific data. However, if the presence of landfill gas is causing groundwater contamination, both the groundwater contamination and the landfill gas issues are required to be addressed at the facility.

I will reiterate that **"this decision does represent substantially less sampling costs and burden on Wayne County as they had been sampling all eleven groundwater monitoring wells and 3 surface water sampling points annually for Appendix II constituents**

As I stated in the email immediately below: "As soon as you do receive our technical review letter, however, you will need to immediately revise the Water Quality Monitoring Plan for Wayne County active C&D and closed MSWLF , Permit No. 96-01 reflecting the accurate changes to the Appendix II sampling schedule and associated monitoring wells."

To date, I have not received the updated Water Quality Monitoring Plan with the accurate changes.

Please submit a revised WQMP in the next 30 days.

If you have any further questions, please contact my supervisor, Ed Mussler, at (919) 707-8281 so that we can set up a meeting.

Thank you,

Christine Ritter (Christine.Ritter@ncdenr.gov)
Hydrogeologist
NC Dept of Environment and Natural Resources
Division of Waste Management/Solid Waste Section
Tel: (919) 707-8254
web: http://portal.ncdenr.org/web/wm/sw

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From: Ritter, Christine
Sent: Wednesday, August 06, 2014 10:14 AM
To: 'Jonathan Pfohl'
Subject: RE: Wayne Co Active CDLF_Closed MSWLF (96-01) Request for App 2 Modification DRAFT

You do not need to finalize the Draft request for Appendix II Groundwater Modification-that document will be entered into the NC SWS database as it is.

As soon as you do receive our technical review letter, however, you will need to immediately revise the Water Quality Monitoring Plan for Wayne County active C&D and closed MSWLF , Permit No. 96-01 reflecting the accurate changes to the Appendix II sampling schedule and associated monitoring wells.

From: Jonathan Pfohl [mailto:jpfohl@mesco.com]
Sent: Tuesday, August 05, 2014 1:50 PM
To: Ritter, Christine
Subject: Re: Wayne Co Active CDLF_Closed MSWLF (96-01) Request for App 2 Modification DRAFT

Hi,
Thank you for the early update and partial relief. However, we are disappointed that you have denied our request as written which was based on sound scientific evidence and conformed to 15A NCAC 13B .1634 (c) **AND** (e). We eagerly await your written rational for continued assessment monitoring at any other location when there has been no detections above applicable Standards attributed to anthropogenic source(s) over the past 6.5 years (13 events) except for benzene at MW-2. Interpretation of 15A NCAC 13B .1634 (e) [copied below] and precedence set by the SWS at other facilities indicates that SWS may (ABSOLUTE TERMS NOT AT SWS DISCRETION) give approval to return to detection monitoring due to the lack of exceedances over the past two consecutive events that have been reported to the Division. Basically for completeness we drafted the modification

request provided for under 15A NCAC 13B .1634 (c) rather than simply invoking (e) since relief should have been granted either way. If your rational for denial is based on the few "j-qualified" detections we urge you to more thoroughly review the historical data as verification samples, QC data and background levels at this facility indicate that it's reasonable that they are false positives. Let us know if you require us to "finalize" the Draft document which will entail requesting the partial relief as you stated.
I plan to try schedule a meeting with you for next week to discuss Franklin County LFG Plan and further discuss this if you wish.
Thanks,
Jonathan

15A NCAC 13B .1634 ASSESSMENT MONITORING PROGRAM

(e) If the concentrations of all Appendix II constituents are shown to be at or below background values, using the approved statistical procedures, for two consecutive sampling events, the owner or operator shall report this information to the Division, and the Division may give approval to the owner or operator to return to detection monitoring.

On 8/5/2014 11:57 AM, Ritter, Christine wrote:

> I have made a decision about the Request for Appendix II Groundwater Monitoring Modification. The full suite of Appendix II will be required for collection and analysis from groundwater monitoring wells MW-1R, MW-2, MW-4, MW-6, MW-8, and MW-11 **every 3 (three) years**. Mercury will be analyzed from groundwater monitoring well MW-8 **annually.**
>
> I will write up a formal letter or email with the rationale for this decision, however, I wanted to let you know as soon as possible due to your impending groundwater and surface water sampling schedule for Wayne County.
>
> This decision does represent substantially less sampling costs and burden on Wayne County as they had been sampling all eleven groundwater monitoring wells annually for Appendix II constituents.
>
> ---
>
> **From:** Jonathan Pfohl [mailto:jpfohl@mesco.com]
> **Sent:** Wednesday, July 30, 2014 3:42 PM
> **To:** Ritter, Christine
> **Subject:** Re: Wayne Co Active CDLF_Closed MSWLF (96-01) Request for App 2 Modification DRAFT

Hi,
As requested all the lab results for SW-ByMW-2 are attached and have been previously included in every semi-annual report.
As my previous email read SW-ByMW-2 has been tested for VOCs (APP II Specifically) with zero detections.
Metals have not been tested at this point since it's supplemental (not in SAP only collected to ensure the MW-2 plume is delineated within the compliance boundary) & metals are not a c-o-c at MW-2.
Thanks,
Jonathan

On 7/30/2014 3:17 PM, Ritter, Christine wrote:

> Can you please send me the lab data for SW-by MW-2 including metals data?

From: Jonathan Pfohl [mailto:jpfohl@mesco.com]
Sent: Wednesday, July 30, 2014 1:27 PM
To: Ritter, Christine
Subject: Re: Wayne Co Active CDLF_Closed MSWLF (96-01) Request for App 2 Modification DRAFT

Hi,

Per your request I've attached a table of all surface water detections for this unit that values attain or exceed SWSL or 2B Standards.
The sample IDs on the table correspond with the Figure 2 already submitted and attached here for your convenience.
As I suspected there have been zero surface water detections in excess of 2B Standards that were or are now believed to be attributed to anthropogenic causes.
Supplemental SW-ByMW-2 has consistently been tested semi-annually for VOCs the past 3.5 years (7 events) with zero detections.
When your review is complete simply ask if you would like me to incorporate this table into the final version of the *Request for Appendix II Groundwater Monitoring Modification.*

Thanks,
Jonathan

On 7/25/2014 9:55 AM, Ritter, Christine wrote:

> According to Figure 2 included in the submittal, there are

five surface water monitoring points: SW-1, SW-2, SW-3, (all of those listed as shared), SW-4, and SW-by MW-2 which is adjacent to groundwater monitoring well MW-2 and listed on the figure as a supplemental sample point. While I am interested in all the surface water laboratory sampling data, the SW-by MW-2 surface water sampling point is the sampling location closest to the most contaminated groundwater monitoring well MW-2, so that sampling data is very important for us to evaluate.
Thank you,
Christine

From: Jonathan Pfohl [mailto:jpfohl@mesco.com]
Sent: Thursday, July 24, 2014 8:06 AM
To: Ritter, Christine
Subject: Wayne Co Active CDLF_Closed MSWLF (96-01) Request for App 2 Modification DRAFT

Hi,

I'm sorry but I'm currently in the field this week. I plan to build the detections table and send it to you by Monday. There are redundant surface water point IDs at this facility. I assume you requested
SW-1 (shared), SW-2 (closed) & SW-3 (shared) as shown on Figure 2 and the table will include only these points unless requested otherwise.

I'm almost certain there has never been a surface water exceedance attributed to a release.

Thanks,
Jonathan

On Wednesday, July 23, 2014, Ritter, Christine <christine.ritter@ncdenr.gov> wrote:
Jonathan-
I am reviewing the Water Quality Monitoring modification request and I would like you to send a summary of historical surface water monitoring results for SW-by MW-2, SW-1, SW-2 and SW-3 for the last 19 years highlighting the exceedances above 2B surface water standards to assist in our evaluation of Wayne County's GW monitoring modification request.
Thank you,
Christine

From: Jonathan Pfohl [mailto:jpfohl@mesco.com]
Sent: Friday, July 18, 2014 9:29 AM
To: Ritter, Christine
Subject: Re: Wayne Co Active CDLF_Closed MSWLF (96-01) Request for App 2 Modification DRAFT

End of July would be perfect!
Thank You Very Much,
Jonathan

On 7/18/2014 9:19 AM, Ritter, Christine wrote:

> My apologies-I didn't read all the way through your email. I will try and have the review of the request for groundwater monitoring modifications finished by the end of July as well. I am not sure if that will give you enough time to determine necessary adjustments to the sampling procedures. If changes are approved I will need a revised Water Quality Monitoring Plan as well.
>
> ---
>
> **From:** Jonathan Pfohl [mailto:jpfohl@mesco.com]
> **Sent:** Thursday, July 17, 2014 5:56 PM
> **To:** Ritter, Christine
> **Subject:** Re: Wayne Co Active CDLF_Closed MSWLF (96-01) Request for App 2 Modification DRAFT
>
> Hi,
>
> Although we are still seeking approval of the revised LFG plan Revision 2 dated 3/25/14 this latest inquiry refers to a separate groundwater quality monitoring modification also submitted long ago. Hopefully, this distinction makes a difference in your expected response date. Please let me know so we can plan/ weigh our options accordingly.
>
> Thanks,
> Jonathan
>
> On 7/17/2014 3:46 PM, Ritter, Christine wrote:
>
> > Jonathan-
> > I hope to have the review finished by the end of July but of course

that doesn't ensure that the revised LFG Plan will be approved, so you should be prepared to conduct LFG monitoring in accordance with the 2 separate LFG Plans already approved and in place.
Christine

From: Jonathan Pfohl [jpfohl@mesco.com]
Sent: Thursday, July 17, 2014 8:40 AM
To: Ritter, Christine
Subject: Fwd: RE: Wayne Co Active CDLF_Closed MSWLF (96-01) Request for App 2 Modification DRAFT

Dear Ms. Ritter,

Would you please let us know the status of the review of the DRAFT *Request for Appendix II Groundwater Monitoring Modification* report for the Wayne Co. Active CDLF and Closed MSWLF submitted almost 3 months ago.
The next semi-annual event is planned for August and we need to plan accordingly.

Thanks,
Jonathan

-------- Original Message ------
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Subject: RE: Wayne Co Active CDLF_Closed MSWLF (96-01) Request for App 2 Modification DRAFT
Date: Wed, 16 Jul 2014 21:36:37 +0000
From: Drummond, Jaclynne <jaclynne.drummond@ncdenr.gov>
To: Jonathan Pfohl <jpfohl@mesco.com>
CC: Ritter, Christine <christine.ritter@ncdenr.gov>

Since Christine Ritter is overseeing this facility, I forwarded it to her. Please contact her regarding the

status.
Thanks,
Jackie

Jaclynne Drummond
Compliance Hydrogeologist
NC Department of
Environment & Natural
Resources
Division of Waste Management
- Solid Waste Section
Phone/Fax 919-707-8294
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Please consider the environment before printing this email.

From: Jonathan Pfohl [mailto:jpfohl@mesco.com]
Sent: Wednesday, July 16, 2014 4:51 PM
To: Drummond, Jaclynne
Subject: Fwd: Wayne Co Active CDLF_Closed MSWLF (96-01) Request for App 2 Modification DRAFT

Dear Ms. Drummond,

Please let us know when you plan to review this document we sent you on 4/24/14 so that we can plan for the next event scheduled for August 2014.

Thanks,
Jonathan

-------- Original Message ------
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Subject: Wayne Co Active CDLF_Closed MSWLF (96-01) Request for App 2 Modification DRAFT
Date: Thu, 24 Apr 2014 12:47:15 -0400
From: Jonathan Pfohl <jpfohl@mesco.com>
To: Jaclynne Drummond <Jaclynne.Drummond@ncmail.net>, Tim Rogers <Tim.Rogers@waynegov.com>, Randy.Rogers@wayneGOV.com

Dear Ms Drummond,

Attached is a DRAFT *Request for Appendix II Groundwater Monitoring Modification* report for the Wayne Co. Active CDLF and Closed MSWLF.
A hard copy will also be mailed to you which includes a bigger drawing for your review convenience.
This document is considered a draft. Then after receiving your initial feedback we'll make any necessary revisions and re-submit it for final "official" approval.
We have chosen this draft version procedure in an attempt to avoid the potential of conflicting "official" documents which typically causes confusion during implementation.
You may either mark up the document with your thoughts/comments, send them in an email or simply call us to discuss.
The next monitoring event is scheduled for August so a

response prior to July would be greatly appreciated.

If you have any questions or need any additional information please contact us anytime.

Thank you,

Jonathan

--
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